MONSANTO

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August 26, 2016

Steven Knott, Designated Federal Official
Office of Science Coordination and Policy (7201M)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: FIFRA Scientific Advisory Panel; Notice of Public Meeting: EPA's evaluation of the carcinogenic potential of Glyphosate; Request for Information and Comments; Docket ID No. EPA-HQ-OPP-2016-0385 (July 26, 2016)

Dear Mr. Knott:

Monsanto Company ("Monsanto") appreciates the opportunity to write in support of the comments submitted by CropLife America ("CLA") regarding EPA's intent to convene a meeting of the Federal Insecticide, Fungicide, and Rodenticide Act Scientific Advisory Panel ("SAP") to review EPA's evaluation of the carcinogenic potential of glyphosate. Monsanto joins CLA in urging EPA to reconsider the assemblage of the SAP as an unnecessary use of EPA's valuable resources. In the event the SAP convenes, however, Monsanto further supports CLA's opposition to the selection by EPA of any ad hoc SAP members who have direct or potential conflicts of interest on the question of the carcinogenicity of glyphosate.

Glyphosate has been called "the most important herbicide" developed in the post-World War II era.[1] It is a versatile herbicide used by farmers, land managers, and gardeners to simply, safely, and effectively control unwanted vegetation. Since their introduction in 1974, glyphosate-based products have become the most commonly used herbicides in the United States as a result of their ability to control a broad spectrum of weeds while offering extensive economic and environmental benefits. Not only are glyphosate and glyphosate-tolerant crops major contributors to U.S. agriculture and the economy, but glyphosate plays a vital role in reducing agriculture's' carbon footprint.[2] Moreover, having crops that are tolerant to glyphosate is associated with the adoption of conservation tillage practices, including no-till production because herbicide-tolerant crops simplify weed control and improve crop management

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1 Stephen O. Duke & Stephen B. Powles, Glyphosate: A Once-In-A-Century Herbicide, 64 *Pest Manag Sci* 319 (2008).

2 G. BROOKES & P. BARFOOT. GM CROPS: GLOBAL SOCIO-ECONOMIC AND ENVIRONMENTAL IMPACTS 1996–2014 (2016), *available at* http://www.pgeconomics.co.uk/pdf/2016globalimpactstudymay2016.pdf.

flexibility.[3] Even in non-agricultural settings, glyphosate provides cost-effective weed control along highways and other rights of way—glyphosate is 275% less expensive than alternative methods like mowing and other herbicides.[4] Continued access to this technology is essential.

Moreover, EPA has recently made a determination regarding glyphosate's strong safety profile—rendering it unnecessary for EPA to expend its resources to convene the FIFRA SAP in October. A 2015 report of the EPA Cancer Assessment Review Committee (CARC)—the Agency's independent peer review body for pesticide carcinogenicity classifications[5]—only just recently asked and answered questions as to the carcinogenicity of glyphosate.[6] The CARC Committee included 13 independent career scientists from EPA's Office of Pesticide Programs and EPA's Office of Research and Development, all of whom signed the final report. The CARC reviewed all the mutagenicity studies, toxicology studies and epidemiology studies reviewed by IARC, in addition to many other studies that IARC chose to ignore. On Friday, April 29, 2016, the CARC's Final Report was posted in the glyphosate docket, having classified glyphosate as "Not Likely to be Carcinogenic to Humans"—EPA's most favorable classification.

EPA has long stressed the importance of an objective, transparent and independent scientific process for reviewing the science regarding glyphosate and other herbicides. Monsanto certainly recognizes that, if and when new data becomes available regarding glyphosate or any other herbicides, additional objective review of that data can be appropriate. Here, however, the CARC Final Report has supplied a peer review of available data by independent scientists from two separate EPA offices. Further review at this juncture is, as yet, unnecessary.

In any event, if EPA decides to proceed with convention of the FIFRA SAP in October, we respectfully request that all due consideration be made to the well-articulated comments of CLA opposing the selection by EPA of any ad hoc SAP members who have direct or potential conflicts of interest. The inclusion of scientists who are not impartial—or who have lost their appearance of impartiality—is counter to EPA's goal of assembling a panel of experts to provide sound, independent, and useful scientific and technical advice.

We appreciate the opportunity to provide comments for consideration and look forward to participating in the process going forward.

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3 J. Fernandez-Cornejo, S. Wechsler, M. Livingston & L. Mitchell. *Genetically Engineered Crops in the United States*. USDA ERS Economic Information Bulletin No. 162 (2014), *available at* http://www.ers.usda.gov/media/1282246/err162.pdf .

4 S. Tjosvold & R. Smith. *Alternatives for roadside weed control in Santa Cruz County.* U. Cal. Cooperative Extension (2010), *available at* http://cemonterey.ucanr.edu/files/133468.pdf.

5 *See* https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/evaluating-pesticides-carcinogenic-potential ("The results of the independent review [by the Office of Pesticide Programs] are peer-reviewed by the Cancer Assessment Review Committee.").

6 EPA. Office of Chemical Safety and Pollution Prevention 2015. Glyphosate: Report of the Cancer Assessment Review Committee. October 1 2015, Washington DC.

Best regards,

Monsanto Company

By: _____
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